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August 12, 1999

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

VIA HAND DELIVERY

Ms. Magalie Roman Salas, Secretary
Federal Communications Commission
The Portals
445 12th Street, S.W.
Washington, D.C. 20554

Re: CC Docket No. 96-98; Second Further Notice of Proposed Rulemaking;
Notice of Ex Parte Meeting of Teltrust, Inc.

Dear Ms. Salas:

This letter provides a summary of a telephone conference held on Wednesday, August 11, 1999, between representatives of Teltrust, Inc. ("Teltrust") and attorneys from the Common Carrier Bureau. The Bureau was represented by Claudia Fox and Anthony Mastando, of the Policy and Program Planning Division. Teltrust was represented by: Vicki S. Pearson, Executive Vice President; Steven P. Goldman, Vice President and General Counsel; Liz Petroni, Manager of Teltrust's Regulatory Department; and Loretta J. Garcia, of Dow, Lohnes & Albertson, PLLC.

Teltrust representatives explained Teltrust's directory assistance ("DA") and operator services ("OS") operations and responded to questions from Bureau staff regarding availability and pricing of data for the provision of directory assistance and operator services. Teltrust primarily focuses on providing wholesale DA and OS to telecommunications carriers and the hospitality market. Teltrust's customers include wireline and wireless carriers that provide local and long-distance services. Teltrust offers its services on a nationwide basis, although it may limit the scope of its services to a particular customer to specified regions at the customer's request.

Teltrust obtains most of the data for its DA and OS database from Experian, a company providing wholesale telephone listings, white page, yellow page and other database services. Currently, Teltrust does not purchase data directly from any Regional Bell Operating Companies ("RBOCs"), but it believes that Experian buys its data from most of the RBOCs.

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If Teltrust were to purchase its data directly from the RBOCs under current conditions, it would increase Teltrust's cost of maintaining a database. Not all RBOCs make wholesale data available and some sell only residential or business data on a wholesale basis. Even when the RBOCs make available a whole range of wholesale data, it is priced under tariff at per-query rates that makes it difficult for an outsource provider to compete with the wholesale pricing the RBOC offers to carriers. In addition, the data purchased wholesale from the RBOCs is not available with updates as frequent as the updates the RBOCs provide for themselves. The RBOCs typically update their own databases daily but provide updates to their wholesale purchasers on a weekly, or less frequent, basis.

Teltrust also explained the process by which its operators handle emergency calls for its carrier customers who use Teltrust's OS services. Teltrust loads data for the Automatic Number Identifications ("ANIs") of its customers into Teltrust's database. Included in the data associated with the each ANI is the information for the Public Safety Answering Point ("PSAP") that would be contacted for emergency calls made from that ANI. For any emergency calls not addressed via ANI, Teltrust has the capability to locate the appropriate PSAP for those calls from its own DA database. Once connected to the PSAP, Teltrust's operator remains on the line until he or she ascertains that Teltrust's presence is no longer needed.

Teltrust has carrier customers requesting DA services on a national basis, regional basis and local basis. For local DA, Teltrust trains its call center staff so they will be familiar with the localities and any necessary variations on word pronunciations. For its carrier customers, Teltrust offers a DA search capability based on a "geo-code," with the search encompassing a 25-mile radius around the requested area code. If that method is not successful, additional search arrangements are employed.

In summary, Teltrust stated that the two biggest obstacles to obtaining data for DA and OS directly from the RBOCs are integrity of the data and RBOC strategic pricing. The quality of the data received when it is purchased wholesale from the RBOC by tariff is lower than the quality of data the RBOC makes available to itself and its affiliates. This is due primarily to the less frequent updates provided to wholesale purchasers. With respect to pricing, Teltrust has difficulty competing against the RBOC within its region in the wholesale market when Teltrust has no alternative but to buy data on a per-query basis and then add its own costs of operation to arrive at its own wholesale price. Obtaining DA and OS data from the RBOCs under an incremental cost basis as unbundled network elements would allow Teltrust to be an outsource choice for telecommunications carriers to compete more effectively with the RBOCs in these markets.

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Please contact the undersigned if you have any questions about the conference described in this letter.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Loretta J. Garcia". The signature is fluid and cursive, with the first name "Loretta" being more prominent.

Loretta J. Garcia
Counsel for Teltrust, Inc.

LJG/rl
Enclosure

cc: Claudia Fox, Esq.
Anthony Mastando, Esq.
Steven P. Goldman, Esq.